

REMARKS

Claims 77-124 are pending. Upon entry of this response, claims 77-125 will be pending, claims 77 and 93 having been amended and claim 125 added in this response. Claims 119-124 are withdrawn. The claim 77 amendment finds support in the specification, page 46, ll. 1-2, and original claims 53 and 54. The claim 93 amendment is for clarification. New claim 125 finds support in claim 77 and original claim 54. Accordingly, there are no issues of new matter.

112, 2nd Paragraph, Rejections

Claims 77-118 were rejected under 35 U.S.C. 112, 2nd paragraph, as allegedly being indefinite. Claim 77 has been amended to clarify the method recited therein. Claim 93 has been amended to clarify the metal-containing component recited therein.

With respect to claim 94, Applicants submit that the moieties represented by Formulas 3 and 4 include both hydrocarbyl-only and substituted aryl groups, by definition of a moiety. Therefore, the formulas recited in claims 96-106, 11-114, and 116-118 are believed to be covered by the claim 94 language. Applicants would be happy to discuss this further with the Examiner.

Accordingly, the rejections are believed to have been overcome. Withdrawal of the rejections is therefore requested.

102(b) Rejections

Claims 77-80, 94, and 107 were rejected under 35 U.S.C. 102(b) as allegedly being anticipated by Yu (US Statutory Invention Registration H766). Applicants traverse the rejections.

Claim 77 as amended is directed to a polyester production method using a catalyst, where the catalyst comprises, *inter alia*, an organic compound component containing at least one moiety represented by Formula 1 (Ar—O—) in *solid* form.

In contrast, Yu discloses a liquid basic catalyst dissolved in a molten normal solid-low melting organic solvent, such as phenol. See Yu, col. 5, ll. 28-30, 64-66. A person skilled in the art would understand from Yu's disclosure that the phenol solvent is in liquid form. Therefore,

Yu neither teaches nor suggests the organic compound component in solid form having a moiety represented by Formula 1, as in Applicants' claim 77.

Therefore, claim 77 and its dependent claims are not believed to be anticipated by Yu. Withdrawal of the rejections is therefore requested.

New Claims

New claim 125 is directed to a polyester production method using a catalyst, where the polyester has, *inter alia*, a glycol component consisting mainly of at least one of ethylene glycol, 1,3-propanediol, 1,4-butanediol, and 1,4-cyclohexane.

In contrast, Yu discloses *aromatic* polyesters composed of aromatic dicarboxylic acid (TPA and/or IPA) and aromatic glycol. See Yu, col. 3, l. 67 – col. 4, l. 20. Yu neither teaches nor suggests the glycol component of Applicants' claim 125.

Therefore, new claim 125 is believed to be patentable over Yu.

CONCLUSION

The claims are believed to be allowable.

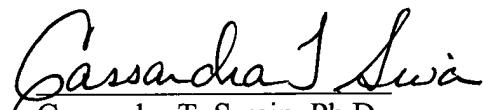
The Examiner is invited to contact the undersigned at 202-220-4200 to discuss any issues regarding this application.

The Office is authorized to charge any fees or credit any overpayment to Deposit Account No. 11-0600 referencing Docket No. 11197/5.

Respectfully submitted,

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